

ELIZABETH SINES, ET AL. )  
 )  
 *Plaintiffs,* )  
 )  
 v. ) **Civil Action No. 3:17-cv-00072-**  
 ) **NKM**  
 )  
 JASON KESSLER, ET AL. )  
 )  
 *Defendants.* )  
 \_\_\_\_\_ )

Defendants Jeff Schoep, the National Socialist Movement (“NSM”), and the Nationalist Front, by and through counsel, respectfully submit this Supplemental Response to Plaintiff’s First Interrogatories and Request for Production of Documents:

1. Identify all means of communication used by you to communicate concerning the Events, whether before, during, or after the Events, and for each means of communication, identify all names, aliases, e-mail addresses, phone numbers, and Social Media Handles you used in connection with such communications, including the 18-digit account identifier associated with any Discord account used by You. Means of communications include, but are not limited to, telephone calls, in-person meetings, and all means of electronic communication including, for example, Social Media, email, SMS messages, podcasts, and online video.

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Supplemental Answer to Plaintiff's First Interrogatories and Request for Production of Documents  
*Sines v. Kessler, et. al.*

Mr. Kolenich, submitted to the court was exactly identical to the interrogatories that were submitted for NSM. The BitChute account should not have been included in Mr. Schoep's interrogatory responses and this was done in error. In email correspondence, Mr. Schoep made it known that the only social media accounts he personally had were a Twitter account and a VK account. Mr. Schoep told his former attorney that NSM had a BitChute account, but it was NOT his personal account nor did he ever have the credentials or log in information for this account. Mr. Schoep's first set of interrogatories should have **only** stated his personal Twitter account and his VK profile.

Instead of distinguishing the answers and submitting them accordingly, Mr. Kolenich submitted the exact same answers for both the NSM and Mr. Schoep. This was inaccurate. The NSM did have a BitChute account and Mr. Schoep was able to obtain the credentials for this account, which he gave to the third party vendor for imaging.

In Mr. Schoep's email correspondence with Mr. Kolenich, he specifies the twitter account, his VK account and email that was used before and after Unite the Right. He specified that NSM had a bitchute account and that is all. This is where the confusion came in and why Mr. Schoep did not initially have any credentials for the NSM's BitChute account.

Respectfully Submitted,

JEFF SCHOEP  
By Counsel

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### **CERTIFICATE OF SERVICE**

I hereby certify that on October 17, 2019, a true and correct copy of the foregoing Supplemental Answer to Plaintiff's First Interrogatories and Request for Production of Documents has been filed with the Clerk of Court through the CM/ECF System, which will send a notice of electronic filing of this pleading to all counsel of record, including:

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